

# MARC ANDREW WILLIAMS

ATTORNEY AT LAW

New Jersey Office:  
100 Winston Drive, #17GN  
Cliffside Park, New Jersey 07010  
Telephone: 917-484-2823  
Fax: 717-842-3466  
mawilliams83@gmail.com

January 9, 2023

***VIA ECF***

Hon. Andre M. Espinosa, U.S.M.J.  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 West Market Street  
Courtroom MLK 2D  
Newark, New Jersey 07102

**Re: Kylen Greene vs. County of Essex, et al**  
**Civil Action No.: 2:20-cv-14723-MCA-AME**  
**Request for Status Conference**

Dear Judge Espinosa:

I represent plaintiff, Kylen Greene, in the above-referenced matter. This is an action brought under 42 U.S.C. §1983 against various state and county-level actors as a result of Ms. Greene's over-detention at the Essex County Correctional Facility.

As the Court may recall, the state defendants made a pre-answer motion to dismiss (ECF No. 13), and as a result, Your Honor stayed discovery on May 26, 2021 (ECF No. 32). We last appeared before Your Honor for a telephonic status conference on June 8, 2022, at which time, a determination was made that counsel should regroup and contact the Court after the state's motion was decided by Judge Neals. Shortly thereafter, on July 5, 2022, the Court issued a text order (ECF No. 39) advising counsel to contact the Court requesting a status conference and a dissolution of the discovery stay once the motion to dismiss was decided. (ECF No. 39). Judge Neals did issue an Opinion and Order granting the state's motion, on December 30, 2022. (ECF Nos. 44-45).

I have conferred with counsel for the remaining county-level defendants, Alan Ruddy, Esq., of the Essex County Counsel's Office, and he and I would like to request a new status conference with the Court. Counsel and I also feel that a settlement conference with Your Honor would be helpful and could lead to a swift resolution of the matter.

We will await the Court's instructions in this regard.

Hon. Andre M. Espinosa, U.S.M.J.

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Marc A. Williams', with a long horizontal flourish extending to the right.

Marc A. Williams

cc: All Counsel Via ECF